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June 3, 2008  
VIA FACSIMILE (212-805-7949)

The Honorable P. Kevin Castel  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

## MEMO ENDORSED

Re: The Associated Press v. All Headline News Corp., et al., 1:08-CV-323 (PKC)

Dear Judge Castel:

I write on behalf of my client, plaintiff The Associated Press ("AP").

In an order issued after the March 28, 2008 initial conference in this case, the Court directed that defendants All Headline News Corp., AHN Media Corp., W. Jeffrey Brown and Danielle George ("Defendants") resubmit any motion to dismiss by May 12, 2008, that AP serve opposition papers by June 5, 2008, and that Defendants serve any reply papers by June 19, 2008. The Court also scheduled a further pretrial conference for June 23, 2008.

On May 25, 2008, my father suffered an accident in my home town, Chicago. This has required his extended hospitalization, and I have been spending time in Chicago at his hospital room and arranging for his medical care. As a result, I was absent from the office four days last week and will also be in Chicago early next week. Given this situation, Eric Prager, counsel for AHN, has consented to an adjustment in the briefing schedule. Subject to the approval of the Court, the revised briefing schedule would be as follows:

AP opposition papers due by June 12, 2008;

AHN reply papers due by June 27, 2008.

A change in the briefing schedule would also require an adjournment of the currently scheduled June 23, 2008 pretrial conference. I have spoken with Mr. Prager, and the only days for a rescheduled conference that currently would present a conflict for either of us would be June 30, July 1, or July 11, 2008. We both request that the Court reschedule the conference for a date other than these conflicted dates.

Finally, I should also note that in accordance with the Court's directions, AP's general counsel and Mr. Brown will be meeting on June 11, 2008 to discuss possible settlement of the litigation.



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I appreciate the Court's consideration in accommodating the changes requested in this letter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew L. Deutsch".

Andrew L. Deutsch

cc: Eric A. Prager (via e-mail)

Schedule approved.  
June 23 conference  
date vacated. New  
date will be provided.

SO ORDERED  
A handwritten signature in black ink, appearing to read "P. Kevin Castel".  
JSD  
6-3-08